

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

MARTIN J. WALSH,
SECRETARY OF LABOR
U.S. DEPARTMENT OF LABOR,

Plaintiff,

v.

PACKERS SANITATION SERVICES, INC.,
LTD.,

Defendant.

No. CV: 4:22-CV-03246

**DEFENDANT’S MOTION FOR LEAVE TO
FILE EXPEDITED REPLY IN SUPPORT
OF MOTION TO QUASH AND/OR
MOTION FOR PROTECTIVE ORDER
AND FOR EXPEDITED RELIEF**

Defendant Packers Sanitation Services, LLC, named in the Complaint as Packers Sanitation Services, Inc., Ltd. (“PSSI” or the “Company”), moves the Court for leave until 12:00 p.m. (CST) on December 1, 2022 to file an expedited reply brief in further support of its Motion to Quash and/or Motion for Protective Order and for Expedited Relief (Doc. 28).

This afternoon, the Secretary filed a twelve page Opposition Brief in response to PSSI’s motion (Doc. 33). Reply motions are afforded under the rules of motion practice, and while PSSI appreciates that it requested expedited relief, and is grateful that the Court has moved expeditiously to respond to PSSI’s request, the Company feels that it is necessary to address numerous factual and procedural issues raised in the Secretary’s Brief that are outside of the scope of PSSI’s original motion.

WHEREFORE, for the reasons set forth above, PSSI respectfully requests that the Court permit it to file a reply brief by 12:00 p.m. (CST) on Thursday, December 1, 2022.

Dated this 30th day of November, 2022.

Respectfully submitted,

/s/ Patrick M. Dalin

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